Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	§	
Increasing Public Safety Interoperability By Promoting Competition For Public Safety Communications Technologies	§	PS Docket No. 10-168

COMMENTS OF THE JOINT COUNCIL ON TRANSIT WIRELESS COMMUNICATIONS

The Joint Council On Transit Wireless Communications (the "Joint Council"), pursuant to Section 1.415 of the Federal Communication Commission ("FCC" or "Commission") Rules and Regulations, 47 C.F.R. § 1.415, respectfully submits these comments regarding PS Docket No. 10-168.

1. INTRODUCTION

1.1 The Joint Council commends the FCC for opening a comment period to understand the current industry conditions which may be hindering efforts toward achieving nationwide interoperability in both narrowband and broadband communications. It is our perspective that transportation plays a critical role in the discussion surrounding nationwide interoperability and broadband communications. Public transportation systems in the United States include automated guideway, rail, bus, ferry and paratransit modes. Public transportation is a critical subset of the national transportation infrastructure and a major component of the economy.

Surety of public transportation is largely reliant on the ability to rapidly and accurately identify and communicate threats against its passengers, employees, vehicles, and facilities. Passenger transportation providers and their personnel are a major part of every metropolitan and suburban evacuation plan and a significant part of rural evacuation plans (i.e., schools, hospitals, nursing homes). It is paramount to ensure voice and data communication systems of transportation are interoperable with the public safety community. This is especially true for broadband communications as the case for public safety broadband communications has largely been centered on first responder personnel viewing live incident images in the field with public transportation owning and operating the majority of CCTV security systems deployed across the nation (i.e., aboard moving vehicles, in passenger stations, along streets, bridges, and highways). We therefore support efforts to ensure nationwide communications interoperability is achieved and upcoming broadband rules foster interoperability between public safety and transportation.

2. THE JOINT COUNCIL ON TRANSIT WIRELESS COMMUNICATIONS

2.1 The Joint Council is an alliance of professionals and transportation organizations created to represent surface land passenger transportation service operators nationwide within the United States on matters of wireless voice and data communications. The Council membership is drawn from public agencies, private providers and industry serving road, water, and rail transit. The Council seeks to educate and inform public and private transportation agencies and providers on issues relating to their use of wireless communications. For additional detail regarding the Joint Council, please refer to our website – www.transitwireless.org

3. COMMENTS

Responses to FCC Questions

3.1 What are the factors that affect the current state of competition in the provision of public safety communications equipment? Are there any additional barriers to additional manufacturers supplying network equipment to the public safety community for narrowband communications? For broadband communications?

a. The U.S. public safety communications market is served by a small group of manufacturers however this is generally the case around the globe. There are very few global manufacturers who have opted to not compete in this market. What does hinder competition in narrowband equipment procurements is the application of proprietary features and or interfaces to proprietary systems. Since the P25 suite of standards has become the national standard for public safety communications, it has been shown that the individual needs of agencies may go above and beyond this specification which has spurred variations in equipment which are labeled as P25 but may only be compliant with the P25 Common Air Interface (CAI).

3.2. How would additional competition in the provision of public safety communications equipment improve narrowband or broadband interoperability? Conversely, what impact does the current state of competition in the provision of public safety communications equipment and devices have on interoperability? Assuming additional competition would benefit public safety interoperability, what actions could the Commission take to improve competition in the provision of public safety communications equipment?

a. Since the Commission has recognized P25 as the standard for public safety interoperability, it should work closely with NIST to ensure that P25 labeled equipment can only

contain standardized and open source features and communication protocols, and eliminate the variations in equipment which have largely contributed to the lack of competition during equipment and system procurements. This effort should extend into the LTE standard to ensure broadband communications are also interoperable between different jurisdictions.

3.3 What are the limitations of Project 25 in promoting narrowband public safety communications interoperability? What actions, if any, should the Commission take to rectify these limitations?

a. The Project 25 Phase 1 (and the upcoming Phase 2 TDMA) standard is a digital voice only protocol, and has not been widely adopted by transportation since our voice communication needs are typically dependent on having a secure and robust data communications system working in an integrated way with our voice systems. While transportation entities recognizes the critical need to be interoperable with public safety, we largely believe that this is best achieved by system level interoperability rather than limited over-the-air interoperability such as that offered by the P25 CAI. In addition, the need for a transportation vehicle to directly communicate with a first responder as a matter of protocol would never occur unless both respective dispatch centers were involved in the exchange and therefore IP system level connectivity is the most secure and reliable means to achieve this communications interoperability. Given this fact, transportation communication systems are commonly deployed using various non-P25 standards or proprietary protocols suitable for transportation use in order to meet our integrated voice and data communication needs. The Project 25 CSSI and ISSI interfaces could be used to address interoperability at the system level,

but at this time neither of these interfaces have been widely adopted or made commercially available by the equipment manufacturers in this market.

3.4. Could open standards for public safety equipment increase competition? What actions could the Commission take to facilitate openness?

a. It is important to note that P25 is not an open standard in the same sense that Internet Protocol (IP) is considered an open standard. The Commission should consider working with the TIA and EIA to encourage these entities to allow manufacturers and users of P25 equipment to have unrestricted access to the P25 standards documents at no cost.

b. With regards to broadband communications, the LTE standard has come a long way without government policy interference and the ERIC should be extraordinarily careful as it works to foster interoperability by pressing policy onto the technology. The role of the ERIC should be to adapt the LTE technology to interoperable policy, rather than attempting to force policy on the technology. The Commission should recognize that technology lifecycles are short and while LTE is still in an infancy state, if policy interferes with the development of LTE it could very well become obsolete by the time the technology meets policy as is now becoming the case with P25.

6. CONCLUSION

6.1 The Joint Council is pleased to have the opportunity to present its comments to the Commission's Public Notice and urges consideration of our suggestions and welcomes further discussion on these issues to the benefit of the transportation industry and the vital interoperability role we have within the public safety community.

Respectfully submitted,

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